

**COMPILATION OF COMMENTS ON COMMITTEE DRAFT**

Project number: <b>IEC 61924 Ed.1</b>	Reference number of the CD <b>80/266/CD</b>
IEC/TC or SC <b>TC 80</b>	Date of circulation <b>2001-02-09</b>
Title of the TC or SC: <b>Maritime navigation and radiocommunication equipment and systems</b>	

<b>Title of the committee draft:</b> IEC 61924 Maritime navigation and radiocommunication equipment and systems - Integrated Navigation System (INS) - Operational and Performance requirements - Methods of testing and required test results
The above-mentioned document was circulated to National Committees with a request that comments be submitted
<b>Comments received</b> – see annex <sup>1</sup>
<b>DECISION OF THE CHAIRMAN</b> (in cooperation with the secretariat)  <p>a <input checked="" type="checkbox"/> A revised committee draft will be circulated as a committee draft for vote (CDV) by (date) <b>2001-07</b></p> <p>b <input type="checkbox"/> A revised committee draft will be circulated for comment by (date) .....</p> <p>c <input type="checkbox"/> The committee draft and comments will be discussed at the next meeting (date) .....</p> <p>NOTE In the case of a proposal <i>a</i> or <i>b</i> made by the chairman, P-members objecting to such a proposal shall inform the Central Office with copy to the secretary in writing within 2 months of the circulation of this compilation (see ISO/IEC Directives, Part 1, 2.5.3).</p>

Name or signature of the Secretary  <b>M. A. Rambaut</b>	Name or signature of the Chairman  <b>Dr A Norris</b>
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<sup>1</sup> to be collated on Form 8C and annexed.

## Annex

Date 2001-01-31	Document 80/266/CD
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National Committee	Clause/ Subclause	Paragraph Figure/ Table	Type of comment (General/ Technical/Editorial)	COMMENTS	Proposed change	OBSERVATIONS OF THE SECRETARIAT on each comment submitted
Norway			General	We find it difficult to comment on the standard by using this formular, especially because of the lack of sub numbering of requirements in the CD, but also because some of our main comments addressing the editing of the standard and lack of similarity with the IMO performance standard are rather extensive. Therefore our approach has been to specify some of the comments in this formular, but also expanding the comments and attach these to the relevant places in the CD itself, which is attached as a separate document. Our comments do not cover the complete CD, but we hope the remarks made may be of assistance in the remaining work to finalize the CD.	The standard should be restructured using a consistent wording in expressing the requirements and to keep information, explanation and examples separate from the chapters addressing requirements.  List requirements preferably in the IMO order of sequence under similar headlines for easy reference and understanding. Quote the IMO text in full and ensure that any additional text included by IEC, or added as sub-clause for clarification, is completed at each of the IMO requirements that are considered unclear.	Accepted Will influence the CDV
Norway	1	Scope	Editorial	The text should address the scope of the IEC standard only. IMO clauses that are included in the Scope are the basis for minimum operational and performance requirements (and implicitly test requirements) and should be moved to the introduction in Chapter 4 "operational and performance requirements"	Maintain the "IEC text" under Scope and move the text quoted from IMO PS to IEC 4.1 Introduction. The IEC 4.1 should contain all the sub-clauses from IMO Scope (1.1 to 1.5) and IMO Application (2.1 to 2.3.3)  (See document attached)	Yes to "added value" clause No to the others because the rest are not requirements although they do define the scope of the document Yes re-draft of 1.5 to clarify the resolution of conflict is an INS clarification
Japan	1	Scope	General	The criteria for applying INS standards should be more clarified. As INS is a system composed from Type approved equipment, it may cause confusion whether re-type test should be required due to an equipment of a part of type approved INS would be changed to other type approved part in practice.		Not agreed see scope and 4.14.3.3 4.2.5 Annex A Clarification of INS in Scope

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Norway	3	Definitions	Editorial	Definitions quoted from IMO PS are sufficiently referenced by being written in <i>italics</i> . Indicating where they can be found in the list of IMO is not necessary.	Delete references to the IMO list of definitions	Rejected for consistency of reference to IMO clauses in the remainder of document
Norway	4		Editorial	Reference is made to our comments under Clause 1 Scope.	The requirements from IMO PS under "Scope" and "Application" should be introduced under 4.1 "Introduction". Any IEC clarification or interpretation needed should be attached to each of the relevant clauses as sub-clauses. The remaining part of the chapter should be identical to chapter 4 "Operational requirements".	Agreed
Norway	4		Editorial	If not otherwise remarked, it is implicit that the requirements under this clause address INS in general. We suggest to use the common IEC headline.	Rename the headline of chapter 4 in accordance with the common IEC clause "Operational and performance requirements".	No the layout of the document to give clarity to General the A,B,C doesnot allow
Norway	4.1	First para	Editorial	Not necessary if the amended structure is adopted	Delete	No - see Scope solution
Norway	4.1	Second para	Technical	See attached document. Declaration of compliance has to refer to test results. The test results are to be provided or witnessed by a competent (accredited) test house. The test report is the basis for the type approval certificate, and test houses cannot take on the responsibility of approving any part of a system based on the manufacturers declaration. (We propose to include documentation requirements in the section for test requirements)	Delete the paragraph. Specify new documentation requirements under the clause (9) for testing. (See next para)	Yes agreed

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Norway	4.1	Third para	Technical	<p>The category of INS to be tested is to provide functions beyond the general intent of the individual equipment being part of the configuration, as defined in their respective performance standards. (See 4.1.6) The reliability and performance of INS cannot be inferior to the performance of the individual equipment, which also are to perform in accordance with their approved stand alone functions when INS fails or is not in use.</p> <p>Consequently, each essential (main) part of the INS is to prove compliance with the relevant performance standards before becoming part of the configuration, meaning that the various parts have been tested in advance of the INS testing and hold relevant type approval certificates. INS Parts not type approved cannot serve any main functions of the INS. Passive parts should (must) meet relevant requirements of IEC 60945 and be approved case by case.</p>	<p>Replace existing para with:</p> <p>The documentation to be submitted by the manufacturer shall include functional description, operational manual and technical manual for the total configuration and the individual equipment/systems being part of the INS. The documentation shall be produced before the functional testing of the INS takes place and at least include type approval certificates in accordance with relevant performance standards for all essential (main) parts of the configuration and certificates in accordance with IEC 60945 for other categories of equipment for which performance standards are not relevant, like additional display units and secondary sources of data, if used.</p> <p>Documentation requirements should be moved and specified in the section (clause) for testing (9).</p>	This comment withdrawn by author-Norway superceeded by other technical changes
Japan	4.11.1	3 <sup>rd</sup> Para.	Technical	A 95% confidence level is so ambiguous.	Delete 3 <sup>rd</sup> paragraph.	Agreed
Norway	4.13.2	Paragraph 3	Technical	The paragraph conflicts with the IMO Draft for "Guidelines on Ergonomic criteria for bridge equipment and layout" which requires that alarms should be indicated in order of sequence. It is further in conflict with the last paragraph in subclause 4.13.2 of this draft international standard.	Delete paragraph 3 in subclause 4.13.2.	agreed - done by including reference to ergonomicGuidelines

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Japan	4.15		Questions	Is a “ QWERTY” common name?		Yes
Japan	4.18		Editorial	Duplicated item. 4.18 & 4.21	Delete one.	Agreed
Norway	4.2	First para	Technical		Move to clause 4 in accordance with IMO grouping of requirements in its performance standard	withdrawn as above
Norway	4.2	Second para	Technical	The IEC clarification/addition to the IMO statement is to general to govern the content and structure of documentation. (Manufacturers declarations are not valid documentation for approval.)	<p><b>a)</b> Establish the IMO part of this para as sub-clause 4. 1</p> <p><b>b)</b> Replace the IEC text with new text (proposed below) under clause 4.1.9 or under the clause for testing (9). New text : The functions provided by the integrated system (combination of navigational aids – see 4.1.6), category A, B and C respectively, (see 4.2.8) that are beyond the general intent expressed by the functions required in the performance standards for the individual parts of the system configuration and provides added value in accordance with 4.1.1 in supporting safety of navigation as well as mode and situation awareness (see 4.1.1 and 4.1.2), shall be documented by the provider of the system</p>	withdrawn and comments re submitted to WG10 by Norway
Japan	4.2.11	j)	Editorial	Extrapolating the data may lead to displaying inaccurate data.	Delete sentence after “For sensor data .....time of distribution.” in last three lines.	Agreed
Japan	4.2.4	2ndpara	Technical	Only 9.9Kt is not enough for displaying ship’s speed.	Change first sentence as follows. “All speed information .....at least tenth a knot up to 9.9, and ...”	Rejected not consistent with SDME
Japan	4.20		Editorial	“Competent authority” should be “competent body”	Change words.	Agreed
Japan	4.5.1	2 <sup>nd</sup> Para.	Editorial	Could be confusing in this title “Interfacing”	Delete 2 <sup>nd</sup> paragraph otherwise move to any suitable item.	Agreed
Norway	4.6		Technical	Please see comments for the clauses up to clause 4.6 in the attached document. Proposed new text is underlined and written in green colour		withdrawn and comments re submitted to WG10 by Norway

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Japan	7.2.1	& 7.2.2	Editorial	To clarify the meaning of "Route planning" and "Passage planning"	To be defined both of words "Route planning" and "Passage planning"	Agreed
Japan	9.3.2.1		Editorial	Remove squer blackest of 60Hz in last sentence.		Agreed
Japan	9.8.1		Editorial	"ETR 028" is a not international standards.		Agreed
Japan	Annex	A1.1	Editorial	NMEA is a not internatioanal standards.	To be used IEC 61162-1/2.	Agreed
Norway	Annex E.3		Technical	A performance standard for "Bridge (Navigational) Watch Alarm system" is currently being developed by IMO NAV (target completion date 2001). A specification of such system, which may differentiate from the IMO performance standard, should therefore be avoided in this international standard.	Delete Annex E.3	Agreed